

# United States District Court

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

ANTHONY JUNAID

(Name and Address of Defendant)

## CRIMINAL COMPLAINT

CASE NUMBER: 04 M 0481-RBC

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about December 2001 and continuing in Suffolk County and elsewhere, county, in the until at least March 2002

District of Massachusetts and elsewhere defendant(s) did, (Track Statutory Language of Offense)

did knowingly execute and attempt to execute a scheme and artifice to defraud several federally insured financial institutions, including Fleet Bank, and to obtain money owned by and under the custody and control of said institutions, by means of false and fraudulent pretenses, representations and promises, in that he deposited into fraudulently opened accounts at said institutions checks he knew to be stolen, altered, and otherwise fraudulent; and then withdrew monies from those accounts,

in violation of Title 18 United States Code, Section(s) 1344 and 2.

I further state that I am a(n) United States Postal Inspector and that this complaint is based on the following facts:  
Official Title

See attached Affidavit of Paul K. Durand

Continued on the attached sheet and made a part hereof:

☒ Yes ☐ No

Paul K. Durand  
Signature of Complainant

Sworn to before me and subscribed in my presence,

10-05-2004 *at 1:02 pm*  
Date

at

Boston, Massachusetts  
City and State

ROBERT B. COLLINGS  
UNITED STATES MAGISTRATE JUDGE  
Name & Title of Judicial Officer

[Signature]  
Signature of Judicial Officer

AFFIDAVIT OF POSTAL INSPECTOR PAUL K. DURAND

1. I am a United States Postal Inspector and have been so employed for 18 years. My investigative experience includes, but is not limited to, drug interdiction, child pornography, and internal postal employee investigations. Since October 1999, I have been assigned to the Boston Field Office to investigate various types of financial crimes, including check and bank fraud, credit card fraud, and identity theft. I have attended numerous check and credit card fraud working group meetings. I have also received training in this area sponsored by the International Association of Financial Crimes Investigators. I have made arrests and executed search warrants in this field.

2. This affidavit is submitted in support of a complaint charging Anthony Junaid (year of birth 1962) ("Junaid") with bank fraud, in violation of 18 U.S.C. Section 1344. The facts stated in this affidavit are based upon my personal knowledge, as well as upon information I have received from other law enforcement officers and other individuals involved in this investigation. Since this affidavit is made for the limited purpose of supporting a complaint, I have not set forth every fact learned during the course of this investigation. Rather, I have set forth only those facts I believe are necessary to establish the requisite probable cause.

3. During much of 2002, other law enforcement officers and I were involved in the investigation of a bank fraud scheme in which there is probable cause to believe Junaid was a participant. The scheme involved opening bank accounts in the names of identity theft victims using addresses that were private mail boxes, depositing fraudulent financial instruments into the bank accounts to inflate the balance, and making withdrawals from the accounts until the bank became aware the instruments deposited were worthless. In addition, debit cards obtained by opening these accounts were used to purchase U. S. Postal Service money orders, which were then cashed or deposited into additional bank accounts.

4. Under Title 18, United States Code, Section 1344, it is a federal crime to defraud or attempt to defraud a federally insured financial institution. At all relevant times, Fleet Bank deposits were insured by the Federal Deposit Insurance Corporation

5. In September 2003, Steven Hooks pleaded guilty in this Court (Criminal No. 03-10014-REK) to a three-count indictment charging him with bank fraud, in violation of 18 U.S.C. § 1344. In connection with that plea, Hooks admitted to opening numerous bank accounts - in names that included Victor Negrete, Victor Shun, Jeff Jean, Maxwell Kalan d/b/a

Max Cleaners, and Rheinholds Grellman - using stolen identities, making deposits into those accounts with stolen and altered checks, and later withdrawing and attempting to withdraw funds.

6. Before entering his guilty plea, Hooks and his counsel met with me and with a Boston Police fraud investigator. During that meeting, Hooks informed us that Junaid had arranged for Hooks to receive stolen identity documents and stolen and altered checks, which Hooks had used in the fraud scheme. He also said Junaid had given him instructions on opening fraudulent bank accounts and cashing fraudulent checks.

7. Hooks was also indicted by a Suffolk County Grand Jury for fraud the committed in 2000. One of the Fleet accounts employed in 2000 by Hooks was in the name of Billy J. Winter. Among the Postal money orders purchased with a debit card from the Winter account was a money order issued on May 7, 2000 in the amount of \$90.00. That money order was made payable to Anthony Junaid and was deposited into an inmate account at the Plymouth County House of Correction in June 2000, at which time Junaid was a Plymouth inmate.

8. On January 30, 2002, Boston Police Detective Steven Blair went to Hooks's residence, 1 Greenwich Street, Apt. 2A,

Roxbury, Massachusetts. Blair spoke to Alicia Johnson, who identified herself as Hooks's girlfriend and stated that Hooks had been working with a group of Nigerians.

9. On March 8, 2002, Blair conducted surveillance at 1 Greenwich Street. He observed a black man exit the building and get into a 1996 Jeep Grand Cherokee, Massachusetts registration No. 3065NC ("the Jeep"). Blair and other Boston officers followed the man to Commonwealth Paging, 31 St. James Avenue in Boston.

10. The Jeep is registered to Adenike Ogundeinde. Boston Police records show that Boston police arrested Junaïd on April 30, 2000 for a domestic assault and battery on Adenike Ogundiende. In March 2002, Postal employees informed me that both Junaïd and Adenike Adekanbi receive mail at 1 Greenwich Street.

11. Among the fraudulent Fleet Bank accounts identified in this investigation was one in the name of Dennis D. Bade. The Bade account was opened on December 6, 2001 at the branch located at 410 Brookline Avenue, Boston. The person who opened the account used a Connecticut driver's license in the name of Bade. That person provided 66 Charles Street, Apt. 474, Boston as his mailing address. The business at 66 Charles Street is a convenience store that rents private mail

boxes. In my experience, private mail boxes or "mail drops" are commonly used in Nigerian fraud schemes. Moreover, 66 Charles Street was used by Hooks in the 2000 case.

12. Fleet Bank surveillance photographs show the person who opened the Bade account. Detective Blair recognized the person in the surveillance photograph as the same individual he followed from 1 Greenwich Street on March 8, 2002. Furthermore, Blair, using Boston Police booking photos, was able to identify the person as Junaid.

13. On March 8, 2002, I went to Commonwealth Paging, 31 St. James Street. Commonwealth Paging sells phone and paging equipment and rents private mail boxes. Based on his experience as a fraud investigator, Blair knows Commonwealth Paging to be a business often used in Nigerian fraud schemes. Like 66 Charles Street, it was also employed by Hooks in 2000. The shop proprietor informed me the individual Blair followed into the store, i.e. Junaid, had, on or about January 29, 2002, opened mail box #317 in the name of Anastascio Adame. The proprietor also said that the man he knew as Adame had that day, March 8, 2002, said he was expecting important mail in the name Steven Rhode.

14. On January 28, 2002, somebody opened a Fleet Bank account in the name of Anastacio Adame, 31 St. James Ave.,

Apt. #317, Boston, Massachusetts. The person opening the account provided, as personal identifying data, a social security number and a date of birth. I know that the first three digits of the social security number he provided designate Arizona. I located an Anastacio Adame in Phoenix and spoke with him via telephone. He said he had not authorized the opening of a Fleet Bank account and that the social security number and date of birth used are not his.

15. Fleet records show that, on March 5 and 13, 2002, checks in the amount of \$28,250 and \$26,700, respectively, were deposited into the Adame account. Both checks were drawn on an account in the name of Wesley Wong at PNC Bank of Kentucky.

16. According to PNC Bank, the checks were written on legitimate home equity account which had been "taken over" by an unknown person or persons via an address change to Mesquite, Texas. Because Fleet had frozen the Adame account, PNC suffered no loss as a result of the fraudulent checks made payable to Adame. However, PNC suffered a loss of approximately \$38,000 on the account on checks negotiated in Brooklyn, New York; Minnetonka, Minnesota; and San Jose, California.

17. On September 1, 2001, a Fleet Bank surveillance

photo captured Hooks as he opened an account at the Fleet branch located at 410 Brookline Avenue, Boston. The account was in the name of Victor T. Negrete, date of birth 7/12/61; social security number 601-36-4588; address 492 Walpole, Norwood, Massachusetts. That address belongs to a mail drop, in this case a convenience store that rents private mail boxes. The social security number provided belongs to a true person, Victor T. Negrete of Phoenix, Arizona, date of birth 7/16/61.

18. According to Bank of America, on September 11, 2001, somebody fraudulently opened a Bank of America MasterCard Account in the name of Robert Mountain of Norwood, Massachusetts. Bank of America lost \$7,400 on the account when a check drawn on the account was deposited into the Fleet Bank account of Victor Negrete. On November 6, 2001, a Fleet Bank surveillance camera at the Fleet branch located at 855 Boylston Street, Boston captured the individual depositing that check into the Negrete account. The individual pictured in the surveillance photograph is Junaid.

19. Fleet Bank suffered a loss of approximately \$6,665.65 on the Negrete account. Nine Postal money orders were purchased with the debit card issued on the Negrete account. Five of the money orders were deposited into a Fleet

Bank account in the name of Jeff Jean. Three money orders were made payable to Max Cleaners and negotiated at Fleet Bank. Fleet Bank surveillance photos show that Hooks opened both the Jeff Jean and Max Cleaners accounts.

20. On September 5, 2001, a Fleet Bank account was opened at the Fleet Bank branch at the Chestnut Hill Mall, Newton, Massachusetts in the name of Alicia J. Dierks of Boston. Alicia J. Dierks in fact resides in Texas and has denied authorizing the opening of this account. The Dierks account was inflated with fraudulent checks. Fleet Bank sustained an approximate loss of \$51,871.47 on the Dierks account.

21. Part of Fleet's loss on the Dierks account resulted from the purchase, via debit card, of 47 Postal money orders with a total value \$27,750. The purchases occurred in the Boston area between November 21, 2001 and January 2, 2002. One of the money orders was payable to Anthony Junaid and cashed using Junaid's Massachusetts driver's license at the Mission Hill, Roxbury, Massachusetts Post Office on January 12, 2002. Seven of the money orders were payable to Adenike Ogundiende. Two were payable to Max Cleaners.

22. Two of the money orders purchased with the debit card associated with the Dierks account were payable to R.

Grellman. On December 21, 2001 a Fleet Bank account was opened in the name of Reinhols Grellman, 91 Ames Street, Dorchester. Fleet Bank surveillance photos show Hooks opening that account at the Lower Mills, Dorchester Fleet branch. As identification, Hooks presented a Florida driver's license # G-500393703359.

23. Twenty Postal money orders with a total value of \$11,900.00 were purchased using a debit card associated with the Fleet Grellman account. Three of those money orders were deposited into the Adame account on February 14, 2002.

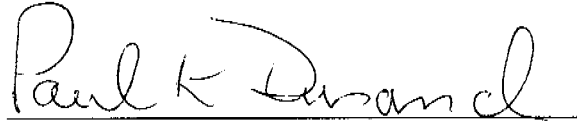
24. As stated above, on March 8, 2002, the proprietor of Commonwealth paging, told me that Junaaid (using the name Adame) said he was expecting important mail in the name of Steven Rhode. On April 8, 2002, I again went to Commonwealth Paging where I recovered a U.S. Bank Visa credit card and a Discover credit card, both sent via the U.S. Mail to Steven Rhode, 31 St. James Avenue, Apt. 317, Boston.

25. According to investigators for U.S. Bank and Discover Card, the Rhode accounts belonged to a true person in Seattle, Washington, and had been "taken over" via a telephonic change of address to 31 St. James Ave., Apt. 317. Records show that the U.S. Bank and Discover received the change of address requests on March 8, 2002.

26. Examination of fingerprints recovered on certain of the money orders involved in this investigation has determined that Junaaid's fingerprints are on seven of the Dierks money orders that were negotiated. Three of these money orders were payable to E. Ogundeinde; one was payable to Adenike Ogundeinde; one was payable to Max Cleaners.

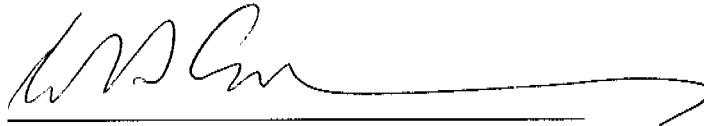
27. Based on the above, I submit there is probable cause to believe that, beginning no later than December 2001 and continuing on various dates until at least March 2002, Anthony Junaaid did knowingly execute and attempt to execute a scheme and artifice to defraud Fleet Bank, a federally insured financial institution, and to obtain money owned by and under the custody and control of Fleet Bank, by means of false and fraudulent pretenses, representations and promises, in that he deposited into fraudulently opened accounts at federally insured banks checks he knew to be stolen, altered, and otherwise fraudulent; and then withdrew monies from those

accounts, in violation of Title 18, United States Code,  
Section 1344 and Section 2.

A handwritten signature in cursive script, reading "Paul K. Durand".

PAUL K. DURAND  
United States Postal Inspector

Sworn to and subscribed before me this 5<sup>th</sup> day of October,  
2004.

A handwritten signature in cursive script, reading "Robert B. Collings".

ROBERT B. COLLINGS  
United States Magistrate Judge